



JEFFREY M. NELSON
Chief Legal Officer

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March 2, 2020

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Application of Duke Energy Carolinas, LLC for Approval of Proposed Electric Transportation Pilot and An Accounting Order to Defer Capital and Operating Expenses
Docket No. 2018-321-E

Dear Ms. Boyd:

By this letter, the South Carolina Office of Regulatory Staff (“ORS”) hereby notifies the Public Service Commission of South Carolina (“Commission”) that ORS has reviewed the request submitted by Duke Energy Carolinas, LLC (“DEC” or the “Company”) in the above referenced docket on January 7, 2020. DEC proposes to modify one of the four programs proposed as part of its pending Electric Transportation Pilot application.

Overview of Company’s Request

The Company proposes to modify the Residential Electric Vehicle (“EV”) Charging Utility Management Program (“Residential Charging Program”) which currently requires “eligible EVSE”¹ to possess networked capabilities, which will allow the Company to collect usage characteristics of EV charging behavior, better understand potential grid and utility impacts from EV charging, and implement utility-managed charging.”² Upon learning that prospective EVSE vendors offered compatibility with only one type of technology, which would limit customer options and program participation, the Company proposes to collect charging data and issue requests to reduce or curtail charging to participating customers instead of directly controlling residential EV chargers.

¹ “Electric vehicle supply equipment” or “EV chargers”.

² Amended Application at 10, Docket No. 2018-321-E (April 1, 2019).

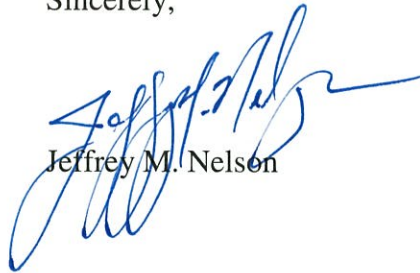
The Company believes modifying the Residential Charging Program will increase customer participation, reduce EV charging station costs, enhance customer autonomy, and reduce complexity of administering the program.

ORS Review

ORS's positions as outlined in the ORS letter dated August 12, 2019³ on the DEC's pilot program remain unchanged and unaffected by the Company's requested modification.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Jeffrey M. Nelson

cc: All Parties of Record (via e-mail)
Joseph Melchers, Esquire (via e-mail)

³ See Attachment A.

Nanette S. Edwards, *Executive Director*



JEFFREY M. NELSON
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August 12, 2019

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: **Docket Nos. 2018-321-E and 322-E**

Dear Ms. Boyd:

The South Carolina Office of Regulatory Staff ("ORS") files this letter in response to Duke Energy Carolinas ("DEC") and Duke Energy Progress ("DEP") (collectively, "Companies") letter filed on August 8, 2019. ORS agrees that constructive conversations between the Companies and ORS resulted in (1) an agreement by the Companies to withdraw from Commission consideration the request for a predetermination by the Commission permitting recovery of carrying costs on the ET Pilot programs implementation costs; and (2) an agreement by the ORS to withdraw its request for customer notice and hearing.

Other issues remain unresolved and are reserved for the Commission to consider the impacts to customers including:

- (1) Request for an Accounting Order to defer capital costs and operating expenses related to the ET Pilot;
- (2) Residential EV Charging Program;
- (3) EV School Bus Charging Station Program;
- (4) EV Transit Bus Charging Station Program; and
- (5) DC Fast Charging Station ("DCFC") Program

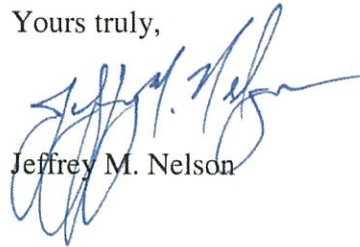
ORS reiterates its comments filed on May 20 and July 9, 2019 regarding the lack of a sufficient cost-benefit analysis and objection to the Companies request for an accounting order. ORS recommended shifting funding from rebates on EV school buses to make-ready and charging

Letter – Jocelyn G. Boyd, Esquire
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August 12, 2019

ATTACHMENT A

infrastructure. ORS also recommended against expansion of the DCFC program beyond that originally proposed by DEC and DEP without further cost-benefit analysis.

Yours truly,

A handwritten signature in blue ink, appearing to read "Jeffrey M. Nelson", is written over the printed name.

Jeffrey M. Nelson

cc: Joseph Melchers, Esquire (via E-mail)
All Parties of Record (via E-mail)

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